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9 *Attorneys for Plaintiff*

10 [Additional counsel on signature block]

11 **IN THE UNITED STATES DISTRICT COURT
12 FOR THE DISTRICT OF NEVADA**

13 DENISE DEANGELIS, derivatively on behalf of
14 ANAVEX LIFE SCIENCES CORP.,

15 Plaintiff,

16 vs.

17 CHRISTOPHER MISSLING, PETER
18 DONHAUSER, JIONG MA, ATHANASIOS
19 SKARPELOS, STEFFEN THOMAS, and
20 CLAUS VAN DER VELDEN,

Defendants,

and

ANAVEX LIFE SCIENCES CORP.,

Nominal Defendant.

Case No.: 2:24-cv-00891-JCM-MDC

**STIPULATION EXTENDING TIME FOR
PLAINTIFF TO RESPOND TO NOMINAL
DEFENDANT ANAVEX LIFE SCIENCES
CORP.'S OPPOSITION (ECF NO. 8) AND
COUNTERMOTION (ECF NO. 11)
(First Request)**

The parties to the above-captioned action hereby stipulate to extend the amount of time for plaintiff Denise Deangelis (“Plaintiff”) to: (1) reply to Nominal Defendant Anavex Life Sciences Corp.’s (“Anavex” or the “Company”) Response to Motion for Entry of Clerk’s Default (the “Opposition”) filed October 8, 2024 (ECF No. 8); and (2) respond to Anavex’s separately filed Counter Motion for Scheduling Order filed October 9, 2024 (ECF No. 11) and in support thereof state as follows:

WHEREAS, on May 13, 2024, Plaintiff filed a Verified Shareholder Derivative Complaint on

**STIPULATION EXTENDING TIME FOR PLAINTIFF TO RESPOND TO NOMINAL DEFENDANT
ANAVEX LIFE SCIENCES CORP.'S OPPOSITION AND COUNTERMOTION**

1 behalf of Nominal Defendant Anavex in this Court alleging causes of action for breach of fiduciary duties,
2 unjust enrichment, waste of corporate assets, gross mismanagement, abuse of control, and violations of
3 Section 14(a) of the Securities Exchange Act of 1934 (the “Exchange Act”) against defendants Christopher
4 Missling (“Missling”), Peter Donhauser, Jiong Ma, Athanasios Skarpelos, Steffen Thomas, and Claus van
5 der Velden (collectively, the “Individual Defendants,” and together with Anavex, the “Defendants”), and
6 against Defendant Missling for contribution under Sections 10(b) and 21D of the Exchange Act (ECF No.
7 1);

9 WHEREAS, on July 1, 2024, Plaintiff personally served Nominal Defendant Anavex (ECF No.
10 5);

11 WHEREAS, on September 26, 2024, Plaintiff filed a Request to the Clerk of the Court to Enter
12 Default as to Anavex (ECF No. 7);

13 WHEREAS, on October 8, 2024, Anavex filed a Response to Motion for Entry of Clerk’s Default
14 (the “Opposition”) (ECF No. 8);

15 WHEREAS, on October 9, 2024, Anavex separately filed a Counter Motion for Scheduling Order
16 (the “Countermotion”) (ECF No. 11);

17 WHEREAS, Plaintiff’s current deadline to reply to the Opposition is October 15, 2024;

18 WHEREAS, Plaintiff’s current deadline to respond to the Countermotion is October 23, 2024;

19 WHEREAS, counsel for Plaintiff and counsel for Anavex have met and conferred regarding the
20 Opposition and Countermotion and the most efficient way to proceed and agree that a one-week extension
21 of Plaintiff’s deadline to reply to the Opposition, and a one-week extension of Plaintiff’s deadline to
22 respond to the Countermotion are reasonable, particularly given that this is the first stipulation for
23 extension of time to file responses sought.

24 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the respective
25 parties hereto, that:

1. Plaintiff's deadline to reply to the Opposition shall be October 22, 2024.
2. Plaintiff's deadline to respond to the Countermotion shall be October 30, 2024.

Respectfully submitted,

Dated: October 15, 2024

LEVERTY & ASSOCIATES LAW CHTD.

/s/ Patrick Leverty

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Attorneys for Plaintiff

Dated: October 15, 2024

HOLLAND & HART LLP

IT IS SO ORDERED.

Hon. Maximilian D. Couvillier III
United States Magistrate Judge
Dated: 10-16-24

/s/ Robert Cassity

/s/ Robert Cassity
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